| | <i>i</i> I | | |
|----|--|--|--|
| 1 | ADAM PAUL LAXALT | | |
| 2 | Attorney General ERIN L. ALBRIGHT, Bar No. 9953 | | |
| 3 | Deputy Attorney General State of Nevada | | |
| 4 | Bureau of Litigation Public Safety Division | | |
| 5 | 100 N. Carson St. Carson City, NV 89701-4717 | | |
| 6 | Tel: 775-684-1257 E-Mail: ealbright@ag.nv.gov | | |
| 7 | Attorneys for Defendants | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | DISTRICT OF NEVADA | | |
| 10 | KEVIN FERNANDEZ, | Case No.: 3:13-cv-00670-RCJ-WGC | |
| 11 | Plaintiff, | STIPULATION AND ORDER TO | |
| 12 | v. | EXTEND DEADLINE TO FILE STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE (FINAL REQUEST) | |
| 13 | BERT JACKSON, et al., | | |
| 14 | Defendants. | | |
| 15 | Defendants by and through its counsel of record, Adam Paul Laxalt, Attorney General of the | | |
| 16 | State of Nevada, and Erin L. Albright, Deputy Attorney General, and Plaintiff, Kevin Fernandez, by and | | |
| 17 | through his counsel of record, Joseph Reiff, Esq., hereby stipulate to extend the time to file the | | |
| 18 | Stipulation and Order of Dismissal with Prejudice by four (4) weeks. | | |
| 19 | On September 18, 2018, defense counsel provided plaintiff's counsel with the revised settlement | | |
| 20 | agreement that reflected the majority of the changes requested by Plaintiff. On the same date, plaintiff's | | |
| 21 | counsel provided the settlement agreement to the New Hampshire prison for delivery to Plaintiff. | | |
| 22 | On October 29, 2018, defense counsel received Plaintiff's requested changes to the revised | | |
| 23 | settlement. Since the settlement documents must be filed today and the parties will not have time to | | |
| 24 | discuss and finalize the requested changes, the parties respectfully request this Court grant one final | | |
| 25 | extension of four (4) weeks to file the Stipulation and Order of Dismissal. | | |
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| 1 | Based on the foregoing, the parties respectfully request this Court extend the time to file the | | |
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| 2 | Stipulation and Order of Dismissal with Prejudice by four (4) weeks. | | |
| 3 | | | |
| 4 | DATED this 29 th day of October, 2018. | DATED this 29 th day of October, 2018. | |
| 5 | PLAINTIFF, KEVIN FERNANDEZ | OFFICE OF THE ATTORNEY GENERAL | |
| 6 | | 0 (20. 1 | |
| 7 | By: <u>/s/ Joseph Reiff</u> Joseph Reiff, Esq. | By: Erin L. Albright, SBN 9953 | |
| 8 | Representing, Plaintiff, Kevin Fernandez | 100 N. Carson Street | |
| 9 | | Carson City, NV 89701 (775) 684-1257 | |
| 10 | | ealbright@ag.nv.gov | |
| 11 | | Attorneys for Defendants | |
| 12 | | | |
| 13 | | | |
| 14 | IT IS SO ORDERED. | | |
| 15 | DATED: October 30, 2018. | | |
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| 17 | 4 | Jilun G. Cobb | |
| 18 | UNITED STATES MAGISTRATE JUDGE | | |
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